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**6 Attorneys for Defendant
BARTON HEALTHCARE SYSTEM**

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA**

11 THERESA HOLBROOK KRAFT, on behalf
of herself and as Successor-in-Interest of
12 PAUL M. KRAFT, RACHEL KRAFT,
SARAH KRAFT, and JEFFREY KRAFT,
13 minors by their Guardian ad Litem, SUSAN
KAREN HOLBROOK.

NO. S-04-129 EJG GGH

Plaintiffs,
v.
SHANNON LANEY, DEANNA LEWIS,
SCHYLER BEATY, MARK GENTLE,
LESLIE SCOTT, CITY OF SOUTH LAKE
TAHOE, CALIFORNIA, DONALD
ATKINSON, COUNTY OF EL DORADO,
CALIFORNIA, BARTON HEALTHCARE
SYSTEM, INC., BARTON MEMORIAL
HOSPITAL MANAGEMENT SERVICES
ORGANIZATION, INC. and DOES 3
through 15, inclusive.

**STIPULATION RE FILING OPPOSITION
TO PLAINTIFF'S MOTION TO
EXCLUDE TESTIMONY OF
DEFENDANT BARTON HEALTHCARE
SYSTEM'S EXPERT TIMOTHY
ALBERTSON, M.D.**

Plaintiffs,

SHANNON LANEY, DEANNA LEWIS,
SCHYLER BEATY, MARK GENTLE,
LESLIE SCOTT, CITY OF SOUTH LAKE
TAHOE, CALIFORNIA, DONALD
ATKINSON, COUNTY OF EL DORADO,
CALIFORNIA, BARTON HEALTHCARE
SYSTEM, INC., BARTON MEMORIAL
HOSPITAL MANAGEMENT SERVICES
ORGANIZATION, INC. and DOES 3
through 15, inclusive.

Defendants

STIPULATION

26 The parties to this action, through their respective attorneys of record, stipulate that the
27 Opposition of Barton Healthcare System to Plaintiff's Motion to Exclude Testimony of Defendant

1 Barton Healthcare System's expert Timothy Albertson, M.D. may be filed on or before Wednesday,
2 September 14, 2005.

3 DATED: September 9, 2005

LAW OFFICES OF AMITAI SCHWARTZ

5 By: _____/s/
6 AMITAI SCHWARTZ
7 Attorneys for Plaintiffs

8 DATED: September 9, 2005

MCDONALD, SAELTZER, MORRIS,
CREEGAN & WADDOCK

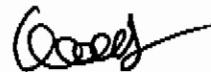
10 By: _____/s/
11 RICHARD C. CREEGAN,
12 Attorneys for Defendants,
13 SHANNON LANEY, DEANNA LEWIS, SCHYLER
14 BEATY, MARK GENTLE, LESLIE SCOTT, DON
15 MUREN and CITY OF SOUTH LAKE TAHOE

16 DATED: September 9, 2005

KROLOFF, BELCHER, SMART,
PERRY & CHRISTOPHERSON

17 By: _____/s/
18 THOMAS O. PERRY
19 Attorneys for Defendant
20 BARTON HEALTHCARE SYSTEM

21 IT IS SO ORDERED.
22 Dated: Sept. 13, 2005


23 GREGORY G. HOLLOWS

24
25 Hon. Gregory G. Hollows
26 United States Magistrate Judge

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